

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 12-20683

Honorable Robert H. Cleland

vs

DAVID CROSSMAN

Defendant.

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**STIPULATION TO ADJOURN MOTION AND PLEA CUT-OFF DATE**

The above parties, by and through their respective counsel stipulate to adjourning the Motion Cut-off date to May 30, 2013, the Plea Cut-off date from June 4, 2013 to June 12, 2013 at 2:00 p.m., the Trial date is set for June 17, 2013. Counsel for both parties are engaged in meaningful plea negotiations and need additional time. Further, counsel needs additional time to consult with client and consider possible motions.

s/ Kevin Mulcahy with consent

KELVIN MULCANY  
Assistant U.S. Attorney  
211 W. Fort St., Ste. 2001  
Detroit, MI 48226  
(313) 226-9713

Dated: May 14, 2013

s/Raymond R. Burkett

RAYMOND R. BURKETT  
Attorney for Mr. Crossman  
37637 Five Mile Road, #177  
Livonia, MI 48154  
(313) 961-0192

Dated: May 14, 2013

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
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UNITED STATES OF AMERICA,

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**ORDER ADJOURNING MOTION CUT-OFF DATE**

The Court, having reviewed the above stipulation of the parties and the record in this matter, and after thoroughly considering the interest of both the defendant and the public, concludes that the ends of justice require granting a continuance in this case. The Court finds that:

- (1) the failure to grant such a continuance in the proceeding would be likely to make a continuation of such proceeding impossible or result in a miscarriage of justice;
- (2) the failure to grant such a continuance in this case, although not an unusual or complex case, the defendant would be prejudiced since counsel's paralegal has only been allowed to see defendant one time.
- (3) the defendant and the government are engaged in meaningful plea negotiations.

Accordingly, the Court hereby ORDERS that the Motion Cut-off date is **May 30, 2013**,

the Plea Cut-off date is **June 04, 2013 at 2:00 p.m.**; and the Trial is set for **June 17, 2013 at 9:00 a.m.**

SO ORDERED:

s/Robert H. Cleland  
ROBERT H. CLELAND  
UNITED STATES DISTRICT JUDGE

Dated: May 16, 2013